

### **REMARKS**

Claims 6-15 and 37-56 are pending in this application and are subject to examination. Newly added claims 37-56 and amended claim 6 have been made for the purpose of clarifying what Applicants regard as the invention. No new matter has been added.

#### **Claim Rejections-35 U.S.C. §102**

Claims 6-15 stand rejected under 35 U.S.C. §102(e), as being anticipated by U.S. Patent No. 6,901,574 issued to LaCour et al. ("LaCour"). This rejection is hereby traversed, as follows.

Claim 6 is directed to a method for generating a lithography mask. The method recites "configuring mask design data to emphasize the context and priority of the features in the mask design based on the context information."

In contrast, LaCour teaches a method and apparatus for creating a mask from IC layout data in a manner that reduces the amount of data that is transmitted to a mask writing tool. This is done by identifying certain cells that are repeated and eliminating redundant representations. To ensure the entire chip is faithfully reconstructed, certain modifications are made to the cells. See LaCour, col. 3, lines 8-14.

LaCour teaches only systems and methods for reducing the amount of data transmitted to a mask writing tool. Nowhere does LaCour disclose configuring mask design data to emphasize the context and priority of the features in the mask design based on the context information.

Dependent claims 7-15 are dependent on independent claim 6 and define further features of the invention. Dependent claims 7-15 are patentable for at least those reasons discussed above with reference to claim 6.

Newly added claims 37-56 correspond to claims 6-15. Therefore, they are also patentable for at least those reasons discussed above.

**CONCLUSION**

Based on the foregoing, all claims are now allowable and a Notice of Allowance is respectfully requested. If the Examiner has any questions or comments regarding this Amendment, the Examiner is respectfully requested to contact the undersigned at (650) 849-4820.

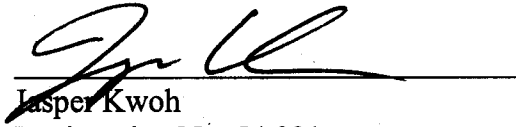
The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. 50-2518, referencing billing number 7010492001.

Respectfully submitted,  
Bingham McCutchen LLP

Dated: \_\_\_\_\_

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